

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,  
  
Plaintiff,

vs.

DAVID REID, et al.,  
  
Defendants.

Case No.: CR05-1849 JH

***(EXPEDITED RULING REQUESTED)***

**UNOPPOSED MOTION BY DEFENDANT DAVID REID TO BE PERMITTED  
TO FLY AN AIRCRAFT JUNE 27, 2006 THROUGH JULY 10, 2006**

Defendant, David Reid, by and through undersigned counsel, hereby moves this Honorable Court to permit him to fly an aircraft June 27, 2006 through July 10, 2006 from the Deer Valley Airport, Arizona to Klamath Falls, Oregon and then returning to the Deer Valley Airport. The grounds for this Motion are:

1. Pursuant to the current terms and conditions of release, Mr. Reid is prohibited from flying an aircraft.
2. Mr. Reid and undersigned counsel were before this Honorable Court on January 5, 2006 at 10:00 a.m. for oral argument on his *Motion to Modify Conditions of Release*. At that hearing, the Court ruled that Mr. Reid would not be permitted to fly an aircraft with the caveat that if Mr. Reid submitted a proper motion regarding future flights, the Court would consider it on a “piece-mail” basis.

3. Mr. Reid has the opportunity to earn money by flying an aircraft from the Deer Valley Airport, Arizona to Klamath Falls, Oregon on June 27, 2006 through July 10, 2006. Mr. Reid has received such an offer from David Lanman of Constellation Aircraft Management. According to a letter from Mr. Lanman, "Please be advised, that it is the intent of CONSTELLATION AIRCRAFT MANAGEMENT, LLC to hire Mr. Dave Reed to fly a King Air A-90 during the proposed period of June 27<sup>th</sup> thru July 10<sup>th</sup>." A true and accurate copy of Mr. Lanman's correspondence is attached hereto as Exhibit "A."

4. Undersigned counsel has contacted Mr. Reid's assigned Pre-trial Services Agency Officer in Arizona, Suzette Frisby, and Ms. Frisby stated that she has no objection to Mr. Reid flying an aircraft June 27, 2006 through July 10, 2006.

5. Undersigned counsel has contacted Mr. Reid's assigned Pre-trial Services Agency Officer in New Mexico, Nick Romero, and Mr. Romero stated that he has no objection to Mr. Reid flying an aircraft June 27, 2006 through July 10, 2006.

6. Undersigned counsel has contacted Assistant United States Attorney James Braun and Mr. Braun has stated he has no objection to Mr. Reid flying an aircraft June 27, 2006 through July 10, 2006.

Based on the foregoing, Mr. Reid requests this Honorable Court enter an Order permitting him fly an aircraft June 27, 2006 through July 10, 2006 to fulfill an obligation with David Lanman of Constellation Aircraft Management.

**RESPECTFULLY SUBMITTED** this 23<sup>rd</sup> day of June, 2006.

/s/ electronically signed

ZUBAIR ASLAMY  
Attorney for Defendant Reid  
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I hereby certify that a true and correct copy  
of the foregoing was filed electronically with  
the court and faxed to the Assistant United States  
Attorney and mailed to the following this 23<sup>rd</sup>  
day of June, 2006.

/s/ electronically signed

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